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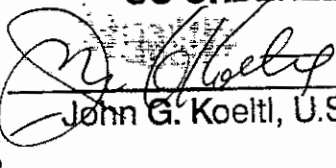ADAM H. BRODSKY

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March 25, 2015

BY ECF

Hon. John G. Koeltl
United States District Judge
United States Courthouse
500 Pearl Street, Courtroom 12B
New York, NY 10007

**APPLICATION GRANTED
SO ORDERED**

John G. Koeltl, U.S.D.J.

3/27/15

RE: *Apple Mortgage Corp. v. Barenblatt, et al.*
(S.D.N.Y. Case No. 13-cv-9233)

Dear Judge Koeltl:

We represent Plaintiff Apple Mortgage Corp. ("Apple") in the referenced action, and I am writing to request a four-day extension of the discovery cut-off in this case, from April 10 to April 14, 2015, to allow for the deposition of non-party witness GuardHill Financial Corporation ("GuardHill"). The current cut-off is embodied in the Second Amended Civil Scheduling Order in this action (the "Order"; ECF Doc. 32). Defendants consent to this short extension.

Subsequent to the entry of the Order on March 2, 2015, we endeavored to schedule all party depositions and the deposition of non-party GuardHill via its president, Alan Rosenbaum, prior to April 10. Because of scheduling conflicts for both Mr. Rosenbaum and GuardHill's counsel, Allan Bloom of Proskauer, we were unable to schedule Mr. Rosenbaum's deposition prior to April 10. However, he as well as all parties' counsel are available on April 14th, and the deposition is currently scheduled for that date. Accordingly, we respectfully request that the Court either authorize this deposition to occur as scheduled subsequent to the current discovery cut-off, or to extend the cut-off to April 14th to abide for this deposition. The parties are not seeking the adjournment of any other dates set forth in the Order.

Respectfully submitted,

Jonathan Rogin

cc: Richard C. Schoenstein, Esq. (by e-mail and ECF)

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